

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

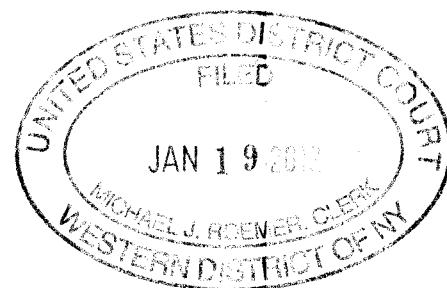
UNITED STATES OF AMERICA,

v.

11-CR-357-A

KEVIN MARTIS,

Defendant.



INFORMATION

(18 U.S.C. §§ 2422(b) and 2252A(a)(5)(B))

COUNT 1

The United States Attorney Charges That:

Between in or about March 2011 and on or about April 20, 2011, in the Western District of New York, the defendant, **KEVIN MARTIS**, did use a facility and means of interstate commerce, that is, the Internet, to knowingly attempt to persuade, induce, entice, and coerce Minor1, a person known to the United States Attorney, an individual less than eighteen (18) years of age, to engage in sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

COUNT 2

The United States Attorney Further Charges That:

On or about April 20, 2011, in the Western District of New York, the defendant, **KEVIN MARTIS**, did use a facility and means of interstate commerce, that is, the Internet, to knowingly attempt to persuade, induce, entice, and coerce Minor2, a person known to the United States Attorney, an individual less than eighteen (18) years of age, to engage in sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

COUNT 3

The United States Attorney Further Charges That:

On or about April 21, 2011, in the Western District of New York, the defendant, **KEVIN MARTIS**, did knowingly possess materials, that is, a Dell, Model Studio computer, serial number 7KJFMH1, and a 320 GB SATA Hitachi hard-drive, Model HTS543232L9300, serial number 090224FB2406LEKGVY CZ, containing images of child pornography, as defined by Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce and that had been shipped and transported in interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section
2252A(a) (5) (B).

DATED: Buffalo, New York, January 19, 2012.

WILLIAM J. HOCHUL, JR.
United States Attorney

BY: *Maura K. O'Donnell*

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